

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

John Doe,)	
)	Civil Action No. 3:20-2755-MGL
Plaintiff,)	
)	
v.)	
)	DEFENDANTS' AMENDED
Mark Keel, in his official capacity as)	SUPPLEMENTAL RESPONSES TO
Chief of South Carolina Law Enforcement)	LOCAL RULE 26.03 INTERROGATORIES
Division, South Carolina Law)	
Enforcement Division ("SLED"),)	
)	
Defendants.)	
_____)	

In accordance with Local Civil Rule 26.03, the Defendants Mark Keel, in his official capacity as Chief of South Carolina Law Enforcement Division, and South Carolina Law Enforcement Division ("SLED") submit following supplemental information:

(2) Fact Witnesses:

(a) Adam L. Whitsett
South Carolina Law Enforcement Division
Post Office Box 21398
Columbia, South Carolina 29211

This witness is the General Counsel for the South Carolina Law Enforcement Division. He may testify to the overall operation and management of the Sex Offender Registry according to federal and state law including policy regarding the Registry. He may also testify as to communications he had with the Plaintiff and his attorney.

- (b) Paul T. Ahearn, III
South Carolina Law Enforcement Division
Post Office Box 21398
Columbia, South Carolina 29211

This witness is the Deputy General Counsel for the South Carolina Law Enforcement Division. He may testify as to SLED's handling of out-of-state offenders and the equivalency reviews performed to determine if and how the out-of-state offenders register. He may also testify as to communications he had with the Plaintiff and his attorney.

- (c) Margaret Osburn
South Carolina Law Enforcement Division
Post Office Box 21398
Columbia, South Carolina 29211

This witness is a paralegal in the Office of General Counsel for the South Carolina Law Enforcement Division. She may testify as to efforts by SLED to obtain and collect information on out-of-state offenders included in the Sex Offender Registry.

LINDEMANN & DAVIS, P.A.

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South Carolina Law Enforcement Division*

March 1, 2021